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To: [Richard Harrington](#)
Subject: BCMR – Responses to Draft Decision
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Hello Richard Newtel response will be mainly aimed at the wholesale market.

Newtel wishes to be more involved with GCRA as we are with JCRA since we have a significant presence and operations in Guernsey

BCMR – Responses to Draft Decision

Wholesale Market

With fibre technology, The concept of same and different exchange does not make any sense any more. Fibre is cheaper than old coax type service and allow capacity of up to 1.4 Tbps. Sure and JT to an extent are retaining that model which makes it impossible to compete in a level playing field when a circuit is ordered from and address to a “different exchange” Newtel view is that this model should disappear and a standard cost for different speed should be applied across any address in Guernsey.

For on island circuits higher than 1Gbps, the prices are more than 10 times those of mainland UK The main cost is the dark fibre element between the A end and B end.

All on-island circuits provided by Sure to Newtek are of type dark fibre.

The equipment's that are put on each end which are used to set the speed are in fact introduced to limit the capacity of the fibre and set/fix the prices. In other words there is no much difference in cost between a 10Mbps and a 10Gbps, however a 10Gbps is 10 times higher in prices than a 10Mbps

Newtel view is that these type of price fixing are clearly an abuse of dominant position from the incumbent and GCRA should look into this into more details.


Also, there is no explanation for the different prices between Jersey and Guernsey.

When a 1Gbps cost 12K per annum in Jersey it cost £24k in Guernsey.

Regards,

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